

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ERIC L. JEFFRIES,	:	
	:	Case No. C-1-02-351
Plaintiff,	:	
	:	(Judge Beckwith)
vs.	:	(Magistrate Judge Hogan)
	:	
CENTRE LIFE INSURANCE COMPANY,	:	<u>AFFIDAVIT OF CHRISTINE L.</u>
et al.,	:	<u>ZERGES</u>
	:	
Defendants.	:	

STATE OF OHIO)
) ss.;

COUNTY OF HAMILTON)

I, Christine L. Zerges, being first duly cautioned and sworn, state as follows:

1. I am over 18 years of age and make this statement based on personal knowledge.
2. I am a paralegal employed by the law firm of Wood & Lamping.
3. I have been assisting William R. Ellis with regard to the above-referenced case.
4. On August 26, 2003 I sent a subpoena to Dr. Pretorius which requested a full and complete copy of his medical records file with regard to Eric Jeffries. The subpoena requested that the records be sent to Wood & Lamping by September 12, 2003.
5. I followed up with Dr. Pretorius' office to confirm that they intended to comply with the subpoena.
6. On September 11, 2003 I spoke with directly with Dr. Pretorius, who told me that the records were being assembled and that I could pick them up at one of his two offices on September 12, 2003. I was asked to call the next day to see which office would have the records.

7. On September 12, 2003 I called Dr. Pretorius' office and spoke with a woman named Vergie. As I had been instructed the day before, I was calling to see which location I should go to pick up the file.

8. Vergie was confused by my request and said that Dr. Pretorius had spoken with Mike Roberts that morning. Vergie reported that Mr. Roberts told Dr. Pretorius that the records they had been assembling were not what Wood & Lamping actually wanted.

9. Vergie said I would have to speak with Dr. Pretorius directly for further clarification.

10. I made several attempts to contact Dr. Pretorius but was unable to do so until September 15, 2003.

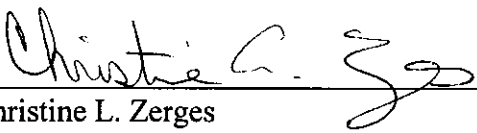
11. When I finally spoke with Dr. Pretorius, he told me that his records had been sent to Mr. Roberts. We obtained this file which consisted of a single sheet of color scans, and no other documentation.

12. On September 16, 2003 I sent another letter to Dr. Pretorius asking that the entirety of his records be sent to Wood & Lamping.

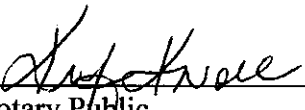
13. After his return from the deposition of Dr. Byron Hyde, Mr. Ellis asked me to get copies of four SPECT scans that had been given to the court reporter as an exhibit to Dr. Hyde's deposition. I requested copies of the four SPECT scans from Dr. Hyde from the Canadian court reporter who had taken Dr. Hyde's deposition in Ottawa, Canada. I received these files on October 23, 2003. That same day I sent the scans for color duplication.

14. On October 24, 2003 these scans were returned and I sent copies to Dr. Frey by Federal Express.

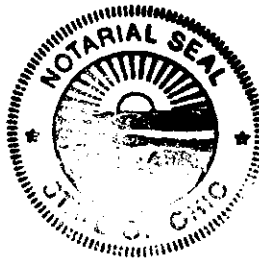
Further affiant sayeth naught.


Christine L. Zerges

Sworn to and subscribed in my presence this 12th day of November 2003.


Notary Public

191152.1



KRISTIN K. KNOLL
Notary Public, State of Ohio
Commission Expires May 19, 2004